

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

FIESTA MART, LLC.

Plaintiff,

v.

**WILLIS OF ILLINOIS, INC. and
WILLIS TOWERS WATSON US LLC**

Defendants.

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CIVIL ACTION NO. 4:20-CV-03484

**AGREED MOTION TO EXTEND
TIME TO FILE RESPONSE TO PLAINTIFF'S FIRST AMENDED COMPLAINT**

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COME DEFENDANTS, Willis of Illinois, Inc. and Willis Towers Watson US, LLC (hereinafter "Defendants"), and file their Agreed Motion to Extend Time to File Response to Fiesta Mart, LLC's ("Plaintiff") First Amended Complaint [Doc #12] and any responsive pleadings and respectfully show the Court as follows:

Plaintiff filed its First Amended Complaint on January 15, 2021 [Doc #12]. Pursuant to Fed. R. Civ. P. 15, Defendants' answer is due on or before Friday, January 29, 2021. Plaintiff's counsel, by way of email communication between Defendant's counsel Kyra Smerkanich, has agreed to extend Defendants' deadline to respond to its First Amended Complaint until February 26, 2021. (*See Exhibit "A."*)

The case is just beginning, and no trial date has been set. Several new parties have recently been added and none of them have made an appearance at this time. Because Plaintiff's amended complaint asserts multiple new allegations Defendants need additional time to further investigate and better understand the recent allegations raised.

The requested extension is necessary to allow Defendants' counsel additional time to investigate and address the new issues raised. The requested extension will not delay the trial of this matter and the requested extension is not for delay, but so that justice may be done. For these reasons, Defendants request the Court to grant this Agreed Motion to Extend Time to File their answer or other responsive pleadings in this case to February 26, 2021.

Counsel for Defendants has conferred with counsel for Plaintiff concerning the relief sought in this motion and Plaintiff's counsel has agreed to the relief sought in this motion.

WHEREFORE, PREMISES CONSIDERED, DEFENDANTS, Willis of Illinois, Inc. and Willis Towers Watson US, LLC move the Court to enter an Order extending the deadline for their response to Plaintiff's First Amended Complaint and any other responsive pleadings until February 26, 2021.

Respectfully submitted,

MARTIN, DISIERE, JEFFERSON & WISDOM, L.L.P.

By: /s/ Christopher W. Martin

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**ATTORNEYS FOR DEFENDANTS
WILLIS OF ILLINOIS, INC. and
WILLIS TOWERS WATSON US LLC**

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing instrument has been mailed, e-mailed, telecopied or hand delivered to all attorneys of record, in compliance with the FEDERAL RULES OF CIVIL PROCEDURE, on this the 29th day of January 2021.

/s/Christopher W. Martin

Christopher W. Martin